DOCKET NO. AAN-CV20-6039670-S : SUPERIOR COURT

DIANNA PIAZZA : J.D. OF ANSONIA/MILFORD

V. : AT MILFORD

JOHN GALLAGHER AND BEATRIZ GALLAGHER : AUGUST 11, 2021

DISCLOSURE OF EXPERT WITNESS

Pursuant to Connecticut Practice Book Section 13-4 (4), the undersigned Defendant hereby discloses the following experts:

A. The name and address of the expert:

Robert B. Cox Cox Weather Services, LLC 435 Main Street, Fourth Floor, Suite 409 Middletown, CT 06457

B. The subject matter of which this expert is expected to testify:

Mr. Cox' testimony will include, but not be limited to, weather conditions on September 25, 2018 and September 26, 2018, including precipitation, National Weather Service warnings, flood conditions, and total rainfall amounts.

C. Substance of Facts and Opinions

Mr. Cox is expected to testify in accordance with his report dated July 27, 2021, which has been provided to all counsel. He will testify that conditions on September 25, 2018 and September 26, 2018 resulted in over 6 inches of rainfall, a magnitude of rain that only occurs once every 32 years in that location. In addition, he will testify that numerous flash flood warnings were in effect during said timeframe.

D. Summary of the Grounds for Each Opinion

Mr. Cox' testimony will be based on his review of climatological data, and his experience, training, and knowledge as a consulting meteorologist.

THE DEFENDANT, JOHN GALLAGHER AND BEATRIZ GALLAGHER

BY_____

Joseph R. Grippe

Ouellette, Deganis, Gallagher & Grippe, LLC

143 Main Street Cheshire, CT 06410

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CERTIFICATION

I hereby certify that a copy of the foregoing sent by mail, pre-postage, or electronically on August 11, 2021 to the following parties of record:

Christopher M. Cerami, Esq. Willinger, Willinger, & Bucci 1000 Bridgeport Avenue Suite 501 Shelton, CT 06484 ccerami@wwblaw.com

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Joseph R. Grippe

Commissioner of the Superior Court